

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AMERITAS LIFE INSURANCE CORP.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 1:23-cv-00236 (GBW)
	:	
WILMINGTON SAVINGS FUND SOCIETY, FSB, SOLELY AS SECURITIES INTERMEDIARY,	:	
	:	
Defendant.	:	
	:	

**DECLARATION OF BRIAN D. BURACK IN SUPPORT OF PLAINTIFF
AMERITAS LIFE INSURANCE CORP.’S *DAUBERT* MOTION TO
STRIKE EXPERT REPORT OF DR. ANDRE P. LIEBENBERG AND
EXCLUDE HIS TESTIMONY**

I, Brian D. Burack, hereby declare and state the following to be true under penalty of perjury pursuant to 28 U.S.C. § 1746 and any other applicable law:

1. I am an attorney admitted to practice in the Commonwealth of Pennsylvania and in the State of New Jersey, with the law firm of Cozen O’Connor P.C., counsel of record for Plaintiff Ameritas Life Insurance Corp. (“Ameritas”) in the above-captioned action, and am admitted in this action *pro hac vice*.

2. I respectfully submit this Declaration and Exhibit Index in Support of Ameritas’s *Daubert* Motion to Strike the Expert Report of Dr. Andre P. Liebenberg and Exclude His Testimony.

3. Attached to Ameritas’s *Daubert* Motion to Strike the Expert Report of

Dr. Andre P. Liebenberg and Exclude His Testimony are the following Exhibits A-E, which are a true and correct copy of the documents and materials described herein:¹

Exhibit	Description	Bates Number(s)
A	Filed Temporarily Under Seal Pursuant to Protective Order	N/A
B	Filed Temporarily Under Seal Pursuant to Protective Order	N/A
C	Filed Temporarily Under Seal Pursuant to Protective Order	N/A
D	Filed Temporarily Under Seal Pursuant to Protective Order	N/A
E	Filed Temporarily Under Seal Pursuant to Protective Order	N/A

Dated: September 5, 2025

/s/ Brian Burack
 Brian Burack, Esq.

¹ Pursuant to D. Del. L.R. 5.1.3 and the Protective Order (D.I. 18 ¶ 6), materials designated confidential under the Protective Order have been filed temporarily under seal.